

EXHIBIT A

1 DEBEVOISE & PLIMPTON LLP
2 Abraham Tabaie (SBN 260727)
atabaie@debevoise.com
3 David Sarratt (SBN 332438)
4 dsarratt@debevoise.com
5 650 California Street
6 San Francisco, CA 94108
Telephone: (415) 738-5700
Facsimile: (415) 644-5628

7
8 SPERTUS LANDES AND JOSEPHS LLP
9 Kevin James Minnick (SBN 269620)
kminnick@spertuslaw.com
10 617 West 7th Street, Suite 200
11 Los Angeles, CA 90017
Telephone: 213-205-6520
Facsimile: Fax: 213-205-6521

12
13 *Attorneys for Defendant Yardi Systems, Inc.*
(Additional Counsel Listed on Signature Page)

14
15 **UNITED STATES DISTRICT COURT**
FOR THE CENTRAL DISTRICT OF CALIFORNIA

16
17 DANIEL FRANK, *et al*,
18 on behalf of themselves and all others
similarly situated,

19 Plaintiffs,

20 v.

21 YARDI SYSTEMS, INC., *et al*,

22 Defendants.

23 Case No. 8:24-cv-00617-JVS-DFM

24
25 **DECLARATION OF GRANT RICE**
IN SUPPORT OF DEFENDANTS'
OMNIBUS MOTION TO DISMISS

26
27
28 DECLARATION OF GRANT RICE IN SUPPORT OF OMNIBUS MOTION TO
DISMISS

1 DECLARATION OF GRANT RICE

2 I, Grant Rice, hereby declare as follows:

3 1. I am Chief Financial Officer and Managing Partner for RAM Partners, LLC
4 ("RAM"), a Defendant in the above-captioned matter.

5 2. I make this Declaration in support of Defendants' Omnibus Motion to Dismiss
6 the First Amended Class Action Complaint. I have personal knowledge of the facts
7 contained in this Declaration, and if called upon as a witness, could testify competently to
8 the matters set forth herein.

9 3. On September 12, 2023, RAM began managing a property named Barrington
10 Hills located at 3352 Chelsea Park Lane, Peachtree Corners, GA 30092 ("3352 Chelsea
11 Park Lane property").

12 4. At the time RAM assumed management of the 3352 Chelsea Park Lane
13 property, Daniel Frank was a tenant residing in Unit 3364C.

14 5. Records accessible to RAM reflect that Mr. Frank signed a lease for Unit
15 3364C at the 3352 Chelsea Park Lane property on February 6, 2023 ("Original Lease").

16 6. It is RAM's practice in the ordinary course of its business to retain and store
17 copies of executed lease and renewal agreements for units at the properties that it manages.

18 7. A true and correct copy of the Original Lease is attached as Exhibit 1.

19 8. On May 1, 2024, Mr. Frank executed a lease extension for Unit 3364C for the
20 period May 1, 2024 to October 31, 2024 ("Lease Extension").

21 9. A true and correct copy of the Lease Extension is attached as Exhibit 2.

22 10. Since assuming management of the 3352 Chelsea Park Lane property, RAM
23 has not licensed RENTmaximizer or Revenue IQ for use at this property and has not used
24 RENTmaximizer or Revenue IQ to recommend lease prices for Frank or any other tenant
25 at this property.

26
27
28 DECLARATION OF GRANT RICE IN SUPPORT OF OMNIBUS MOTION TO
DISMISS

1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 on September 13, 2024, in Atlanta, Georgia.



3 _____
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Grant Rice

DECLARATION OF GRANT RICE IN SUPPORT OF OMNIBUS MOTION TO
DISMISS